

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JENNIFER MILLER, EMAD AL-KAHLOUT, JUMA
LAWSON, PHILIP SULLIVAN, JOSE GRINAN, KELLY
KIMMEY, KIMBERLY HALO, and HAMADY
BOCOUM, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., and AMAZON LOGISTICS,
INC.,

Defendants.

Case No. 2:21-cv-00204-BJR

**STIPULATED MOTION AND ORDER TO
FILE SECOND AMENDED COMPLAINT**

I. STIPULATED MOTION

The parties through their respective counsel stipulate, agree, and move the Court as follows:

1. Plaintiff Jennifer Miller filed this lawsuit on February 17, 2021 (Dkt. No. 1).
2. Plaintiffs Jennifer Miller, Emad Al-Kahlout, Juma Lawson, Philip Sullivan, Jose Grinan, Kelly Kimmey, Kimberly Halo, and Hamady Bocoum filed a First Amended Complaint and a Corrected First Amended Complaint on March 18, 2021 (Dkt. Nos. 14, 19).
3. On May 17, 2021, Defendants filed a Motion to Compel Arbitration and Stay (Dkt. No. 28).

1 4. Federal Rule Civil Procedure 15(a)(2) permits a party to amend its pleading when
2 the opposing parties agree in writing that the amended pleading may be filed.

3 5. Local Civil Rule 15 requires a party seeking to amend a pleading to “attach a copy
4 of the proposed amended pleading as an exhibit to the motion or stipulation. The party must
5 indicate on the proposed amended pleading how it differs from the pleading that it amends by
6 bracketing or striking through the text to be deleted and underlining or highlighting the text to
7 be added.” LCR 15.

8 6. A “redline” copy of Plaintiffs’ Second Amended Complaint reflecting Plaintiffs’
9 revisions to the First Amended Complaint is attached hereto as Exhibit A.

10 7. Defendants consent to the filing of the Second Amended Complaint attached as
11 Exhibit A.

12 8. The parties respectfully move the Court to approve the filing of the Second
13 Amended Complaint attached as Exhibit A.

14 STIPULATED TO AND DATED this 2nd day of June, 2021.

15
16 TERRELL MARSHALL LAW GROUP PLLC

DAVIS WRIGHT TREMAINE LLP

17 By: /s/ Toby J. Marshall, WSBA #32726
18 Beth E. Terrell, WSBA #26759
19 Email: bterrell@terrellmarshall.com
20 Toby J. Marshall, WSBA #32726
21 Email: tmarshall@terrellmarshall.com
22 Jennifer Rust Murray, WSBA #36983
23 Email: jmurray@terrellmarshall.com
24 936 North 34th Street, Suite 300
25 Seattle, Washington 98103
26 Telephone: (206) 816-6603
27 Facsimile: (206) 319-5450

By: /s/ Kenneth E. Payson, WSBA #26369
Kenneth E. Payson, WSBA #26369
Email: kennethpayson@dwt.com
Sheehan Sullivan, WSBA #33189
Email: sheehansullivan@dwt.com
920 Fifth Avenue, Suite 3300
Seattle, Washington 98104
Telephone: (206) 622-3150
Facsimile: (206) 757-7700

MORGAN, LEWIS & BOCKIUS LLP

Richard G. Rosenblatt, *Admitted Pro Hac Vice*
502 Carnegie Center
Princeton, NJ 08540-6241
Telephone: (609) 916-6600
Facsimile: (609) 916-6601
richard.rosenblatt@morganlewis.com

Hillary Schwab, *Admitted Pro Hac Vice*
Email: hillary@fairworklaw.com
Brant Casavant, *Admitted Pro Hac Vice*
Email: brant@fairworklaw.com
FAIR WORK, P.C.
192 South Street, Suite 450
Boston, Massachusetts 02111
Telephone: (617) 607-3260
Facsimile: (617) 488-2261

Andrew R. Frisch, *Admitted Pro Hac Vice*
Email: afrisch@forthepeople.com
Paul M. Botros, *Admitted Pro Hac Vice*
Email: pbotros@forthepeople.com
Email: vfish@forthepeople.com
Email: ctacher@forthepeople.com
MORGAN & MORGAN, P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Telephone: (954) 327-5352

Attorneys for Plaintiff

Michael J. Puma, *Admitted Pro Hac Vice*
1701 Market Street
Philadelphia, PA 19103-2921
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
Email: michael.puma@morganlewis.com
Michael E. Kenneally, *Admitted Pro Hac Vice*
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004-2541
Telephone: (202) 739-3000
Facsimile: (202) 739-3001
michael.kenneally@morganlewis.com

Mary Grace Patterson, *Admitted Pro Hac Vice*
One Federal Street
Boston, MA 02110-1726
Telephone: (617) 341-7700
Facsimile: (617) 341-7701
marygrace.patterson@morganlewis.com

*Attorneys for Defendants Amazon.com, Inc., and
Amazon Logistics, Inc.*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

II. ORDER

The Court GRANTS the parties' stipulated motion and approves the filing of the Second Amended Complaint as set forth above.

IT IS SO ORDERED

Dated this 3rd day of June, 2021.



Barbara Jacobs Rothstein
U.S. District Court Judge